



## TOWN OF JACKSON GASOLINE PIPELINE SPILL UPDATE

**DATE:** May 1, 2013

**CONTACT:** Eric Nitschke, Southeast Regional Director, 414-263-8570

In addition to the update regarding Town of Jackson well sampling results, I am enclosing documents that represent our formal response to the Town Board's decision for a long term water supply solution.

### **Town of Jackson Private Well Sampling Update May 1, 2013**

- On April 9, 2013, benzene was detected at a concentration of 1.2 ug/l in a private water supply well located on Maple Road between Mill Road and Western Avenue. This well has a point of entry treatment system that is working. Due to this detection of benzene along Maple Avenue and the amount of rainfall occurring in the Town of Jackson, the DNR asked West Shore to increase the frequency of private well sampling on the edges of the drinking water advisory area to once per week. West Shore implemented the new sampling schedule the week of April 15<sup>th</sup>. A water sample collected from this well on April 23, 2013, indicated a decrease in benzene concentration to 0.71 ug/l.
- On April 16, 2013, benzene was detected at a concentration of 1.1 ug/l in a private water supply well located on Sherman Road near Maple Road. In response to this detection of benzene, West Shore offered point of entry carbon treatment systems to this well owner and well owners north and west of the property. A water sample collected from this well on April 22, 2013, indicated a decrease in benzene concentration to 0.54 ug/l.
- On April 23, 2013, benzene was detected at a concentration of 173 ug/l in a private water supply well located on Mockingbird Drive. This well has a point of entry treatment system that is effective at removing the benzene to a non-detectable concentration.
- As of May 1, 2013, a total of 37 wells on 35 properties have had detections of petroleum compounds above the laboratory limit of detection and a total of 33 wells on 31 properties have had detections of at least one petroleum compound that exceeds a drinking water standard.

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April 30, 2013

Mr. Ray Heidtke, Chairman  
Town of Jackson  
3146 Division Road  
Jackson, WI 53037

Dear Mr. Ray Heidtke,

On March 26, 2013 the Department of Natural Resources provided a written response to West Shore Pipeline Company regarding the Arcadis report evaluating long term drinking water supply solutions. The department's response provided input regarding public water supply options, guidance about private wells impacted by the fuel spill, and direction to West Shore representatives to work with officials from the Town of Jackson to initiate steps to create a public water supply system. The department is encouraged by the communication by all parties involved.

On April 4, 2013, the majority of the Town Board voted to request West Shore to create a system that would initially utilize Village of Jackson municipal water while Town of Jackson municipal wells are sited and installed. Once Town of Jackson municipal wells were operational, the Town would own and operate its own municipal water system independent of the Village of Jackson's water utility. There are a number of questions and technical issues regarding the Town's proposed solution(s).

As stated in the Department's March 26, 2013, letter to West Shore, the department agrees with the assessment in the Arcadis report that the option of connecting to the Village of Jackson municipal water system could be implemented more quickly than creating a Town of Jackson Sanitary District. The option of establishing a Town of Jackson Sanitary District municipal water system that owns and operates its own groundwater wells presents more challenges than connecting to an existing municipal water system, both in terms of establishing the system and in maintenance and operation of the system.

In an effort to assist both the Town of Jackson and West Shore representatives, department staff have created two fact sheets. One fact sheet provides guidance on establishing a Town of Jackson Sanitary District municipal water system that purchases water from the Village of Jackson. The second fact sheet provides guidance for a Town of Jackson Sanitary District municipal water system that owns and operates its own groundwater wells. The fact sheets are included as attachments. Correspondence from the Public Service Commission is also included as an attachment to provide additional direction towards establishing a Town of Jackson Sanitary District municipal water system.

In addition to the fact sheets, further information about the department's authority and the steps for selecting a remedy may be useful to you. The department has the authority, under ch. 292 of the Wisconsin Statutes (the spills law) and chapters NR 700 through NR 754 of the Wisconsin Administrative Code, to require West Shore, as a responsible party, to provide a safe long term drinking water supply solution.



Chapter NR 722, Wis. Admin. Code, sets forth the requirements for the selection of remedial actions by a responsible party. Like many rules in the NR 700 series, ch. 722 is performance based. The rule generally requires a responsible party to select a remedial action (or combination of remedial actions) that will restore the environment within a reasonable period of time and that will minimize the harmful effects of contamination on the environment.

Once a remedial action (or combination of remedial actions) is selected, the responsible party must submit a Remedial Action Options Report to the department. The report must evaluate the potential remedies considered and must identify the reasons for the selected remedy. Evaluation criteria in ss. NR 722.07 and 722.09, Wis. Admin. Code, include both technical feasibility and economic feasibility. The department reviews the Remedial Action Options Report once it is submitted and may request additional information, require revisions, or approve, conditionally approve, or disapprove the report. If the remedy selected by the responsible party will adequately protect human health and the environment, the department does not have the authority to select an alternative remedy.

No remedy has yet been proposed by West Shore for the contamination caused by the July 17, 2012 gasoline spill. However, the Town Board has voted to require West Shore to construct two safe, long term drinking water supply solutions – a municipal water system that connects to the Village system *and* a municipal water system that owns and operates its own wells. The department does not have the authority under the spills law to mandate that West Shore accept this solution. The department also lacks the authority to require the Village municipal system to extend a water supply outside its boundaries to provide water on a temporary basis to a Town of Jackson Sanitary District municipal water system. Finally, the department does not anticipate requiring West Shore to pay ongoing operation and maintenance costs for any municipal system. Any agreement for ongoing operation and maintenance costs should be between the Town and West Shore.

Please keep in mind, as the process moves forward in the identification of a safe long-term drinking water supply solution, that a special well casing area will be implemented by the department. In anticipation of establishing a special well casing area, department staff are closely monitoring well data following the recent rain events. Department staff anticipates providing detailed direction on a special well casing area by the end of May of 2013.

The department hopes that the fact sheets and the other information provided in this letter will assist you as you move forward with a recommendation to West Shore for a single, safe water supply system. Thank you for your continued efforts to secure the best solution possible for providing Town of Jackson residents a sustainable, long term, safe source of water. Please feel to contact me at 414-263-8570 with questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eric Nitschke", with a stylized flourish at the end.

Eric Nitschke, P.E.  
Southeast Regional Director

cc: Julia Oliver, Town of Jackson Clerk (via email)  
Cheryl Heilman, WDNR Attorney (via email)  
Mark Giesfeldt, WDNR Remediation and Redevelopment Bureau Director (via email)  
Jill Jonas, WND Drinking and Groundwater Bureau Director (via email)  
Lloyd Eagan, WDNR Water Division South District Natural Resource Manager (via email)  
Rhonda Volz, WDNR Drinking and Groundwater Natural Resource Manager (via email)  
Pam Mylotta, WDNR Remediation and Redevelopment Natural Resource Manager (via email)

## Town of Jackson Sanitary District

### Municipal Water Supply System

General guidelines to consider in establishing a Town of Jackson Sanitary District Municipal Public Water Supply using Township owned and operated groundwater wells.

#### Construction

- 1) Establish a Sanitary District under s. 60.71, Wisconsin Statutes.
- 2) Obtain approval to create a new Utility from the Public Service Commission (PSC) under ch. PSC 184, Wisconsin Administrative Code. After approval there are on-going duties and filing responsibilities with annual reports, coordinating and managing utility operations, preparing rate review cases, meter reading and billing, complaint resolution, managing accounts for customers leaving and new customers arriving to the system, to name a few. All of a water utility's operations that are under PSC's jurisdiction are described in ch. PSC 185, Wis. Adm. Code.
- 3) Hire engineering consulting firm to conduct a new system capacity evaluation and a written description of the water system design and report.
- 4) Prepare and submit a capacity evaluation that demonstrates financial, managerial, and technical capacity. Complete evaluation before construction of the new water service as addressed in s. NR 810.24, Wis. Adm. Code. The evaluation may be divided into two phases with Phase I including a Town Sanitary District distribution system connecting to the Village of Jackson water supply, and Phase II detailing the Town Sanitary District Well system connecting to the approved Town distribution system. The full evaluation must include the following elements, under s. NR 810.24, Wis. Adm. Code:

#### Phase I:

- A. A written description of the water system design and report, including master meter location, water treatment, water storage volume, length and diameter of water mains, pressure range within the water system, locations of any pressure reducing valves or pressure booster stations, map or plat showing the proposed water system.
- B. Anticipated average and maximum daily water use.
- C. Anticipated number of industrial, commercial and residential water services.
- D. Initial and projected customer population and service area.
- E. Status of all department permits and approvals related to the construction of the water system.
- F. Information for the identification, location and contact of the water system owner including the name, address and telephone number of the water system owner and the extent of the owner's responsibility for the water system.
- G. Information for the identification, location and contact of the water system manager including the name, address and telephone number of the system manager.
- H. Information for the identification, location, and contact of the water system operator including the name, address and telephone number of the water system's certified operator as defined in s. NR 114.03 (2), Wis. Adm. Code. If a certified operator has not been selected prior to submitting the capacity evaluation, a timetable for hiring an operator shall be

Included as part of the capacity evaluation in lieu of the information for the identification, location and contact of the water system operator. The water system may not be placed into operation until the department is provided with the information for the identification, location and contact of the water system operator.

- I. A plan identifying all sample locations for all monitoring required under ch. NR 809, Wis. Adm. Code and the US EPA Safe Drinking Water Act.
  - J. Description of the operational procedures required by chs. NR 809, 810, 811, Wis. Adm. Code, and ch. PSC 185, Wis. Adm. Code, related to well head protection, well abandonment, cross connection control, operational reporting, meter testing, hydrant and valve exercising and operator certification.
  - K. Copy of the public service commission certificate authorizing construction and operation, and estimating rates, for municipal water systems regulated by the public service commission.
  - L. Statement from the water system owner on the financial capacity of the water system to meet the requirements of ch. NR 810, Wis. Adm. Code.
- 5) Apply to WDNR for Plan and Specification Approval under s. 281.41, Wis. Stats., and chs. NR 810 and 811, Wis. Adm. Code.
  - 6) Construct water distribution system pursuant to all relevant statutes and administrative rules and as approved by all necessary government agencies.

#### Phase II

- 1) Hire engineering consulting firm to conduct a new system capacity evaluation and a written description of the water system design and report.
- 2) Prepare and submit a capacity evaluation that demonstrates financial, managerial, and technical capacity. Complete evaluation before construction of the new water service as addressed in s. NR 810.24, Wis. Adm. Code. The evaluation may be divided into two phases with Phase I including a Town Sanitary District distribution system connecting to the Village of Jackson water supply, and Phase II detailing the Town Sanitary District Well system connecting to the approved Town distribution system. The full evaluation must include the following elements, under s. NR 810.24, Wis. Adm. Code:
  - A. A written description of the water system design and report, including the proposed well construction and the name of the water-bearing formation, pumping capacity, water treatment, water storage volume, length and diameter of water mains, pressure range within the water system, locations of any pressure reducing valves or pressure booster stations, map or plat showing the proposed water system.
  - B. Evaluation of the potential for the water quality to be out of compliance with any of the primary or secondary standards of ch. NR 810, Wis. Adm. Code.
  - C. Anticipated average and maximum daily water use.
  - D. A well site investigation report that includes the separation distances between the well and potential sources of contamination within the proposed wellhead protection area, any violation of the applicable separation distances contained in chs. NR 811 and 812, Wis. Adm. Code, the proximity of the well to any wetlands and the location of the well in relation to the 100-year flood elevation.

- E. Anticipated number of industrial, commercial and residential water services.
  - F. Initial and projected customer population and service area.
  - G. Status of all department permits and approvals related to the construction of the water system.
  - H. Information for the identification, location and contact of the water system owner including the name, address and telephone number of the water system owner and the extent of the owner's responsibility for the water system.
  - I. Information for the identification, location and contact of the water system manager including the name, address and telephone number of the system manager.
  - J. Information for the identification, location, and contact of the water system operator including the name, address and telephone number of the water system's certified operator as defined in s. NR 114.03 (2), Wis. Adm. Code. If a certified operator has not been selected prior to submitting the capacity evaluation, a timetable for hiring an operator shall be included as part of the capacity evaluation in lieu of the information for the identification, location and contact of the water system operator. The water system may not be placed into operation until the department is provided with the information for the identification, location and contact of the water system operator.
  - K. A plan identifying all sample locations for all monitoring required under ch. NR 809, Wis. Adm. Code and the US EPA Safe Drinking Water Act.
  - L. Description of the operational procedures required by chs. NR 809, NR 810, NR 811, and ch. PSC 185, Wis. Adm. Code related to well head protection, well abandonment, cross connection control, operational reporting, meter testing, hydrant and valve exercising and operator certification.
  - M. Copy of the public service commission certificate authorizing construction and operation, and estimating rates, for municipal water systems regulated by the public service commission.
  - N. Statement from the water system owner on the financial capacity of the water system to meet the requirement of s. NR 810.24, Wis. Adm. Code.
- 3) Apply to WDNR for Plan and Specification and Well Start-up Approvals under s. 281.41, Wis. Stats, and chs. NR 810 and 811, Wis. Adm. Code.
  - 4) Construct water supply wells, storage and treatment systems pursuant to all relevant statutes and administrative rules and as approved by all necessary government agencies.

#### Routine Maintenance

Operate and maintain municipal water supply system using best practices and pursuant to chs. NR 809, 810, and 811, Wis. Adm. Code as required for the protection of the public health safety and welfare.

- 1) Establish and conduct all SDWA monitoring required for a municipal public drinking water system. Monitoring plan will be established based upon population served, well susceptibility and municipal standards under ch. NR 809, Wis. Adm. Code.
- 2) Install and implement treatment for any water quality exceedances that develop at the source water.

### Sustaining the Public Water Supply for the Long-term

- 1) Provide training for staff in the operation and maintenance of the equipment (used for treatment including chemical additions) and maintain up-to-date manuals for the operation and maintenance of the equipment, as required by s. NR 810.25, Wis. Adm. Code.
- 2) Install water supply system security devices such as locks, fences, surveillance cameras, intrusion alarms, etc, as required by s. NR 810.23, Wis. Adm. Code.
- 3) Develop an emergency operations plan to prepare for, respond to, mitigate and recover from all types of emergency situations, including terrorism, sabotage, natural disasters such as floods and tornadoes, loss of system-wide pressure, and overfeed of the chemical, as required by s. NR 810.23, Wis. Adm. Code.
- 4) Provide a current map of the water system which shows the size and location of all facilities and appurtenances, such as water mains, valves, hydrants, wells, pumping stations, treatment plants and water storage facilities. As required by s. NR 810.26, Wis. Adm. Code. Two current copies of this map shall be kept on file with the department (central and regional offices) at all times.
- 5) Develop and implement department approved Well Head Protection Plans, as required by s. NR 810.26, Wis. Adm. Code.
- 6) Develop emergency chlorination plans, with appropriate chlorination infrastructure and chlorine available to obtain 0.5 mg/l free chlorine throughout its distribution system within 4 hours, as required by s. NR 810.26, Wis. Adm. Code.
- 7) Develop and implement a long-term maintenance and repair funding and replacement schedule for all aspects of water supply and distribution system including pumps, mains, etc, as required by s. NR 810.26, Wis. Adm. Code.

### DISCLAIMER

*This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance is not complete, to the extent that there are additional considerations under state and local law that are not referenced in this document. Please note that Wisconsin statutes and administrative rules, including chs. 280 and 281, Wis. Stats., and chs. NR 809 to 812, Wis. Adm. Code, contain numerous detailed requirements for water supply systems that are not referenced in this document, but which would also apply to a water supply system.*

*This document does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*



## Town of Jackson Sanitary District

### Consecutive System to Village of Jackson Municipal Water Supply

General guidelines to consider in establishing a Town of Jackson Sanitary District Municipal Public Water Supply as a Consecutive System to the Village of Jackson Municipal Public Water Supply System

#### Construction

- 1) Establish a Sanitary District under s 60.71, Wisconsin Statutes.
- 2) Obtain approval to create a new Utility from the Public Service Commission (PSC) under ch. PSC 184, Wisconsin Administrative Code. After approval there are on-going duties and filing responsibilities with annual reports, coordinating and managing utility operations, preparing rate review cases, meter reading and billing, complaint resolution, managing accounts for customers leaving and new customers arriving to the system, to name a few. All of a water utility's operations that are under PSC's jurisdiction are described in ch. PSC 185, Wis. Adm. Code.
- 3) Hire engineering consulting firm to conduct a new system capacity evaluation and a written description of the water system design and report.
- 4) Prepare and submit a capacity evaluation that demonstrates financial, managerial, and technical capacity. Complete evaluation before construction of the new water service as addressed in s. NR 810.24, Wis. Adm. Code. The evaluation must include the following elements, under s. NR 810.24, Wis. Adm. Code:
  - A written description of the water system design and report, including master meter location, water treatment, water storage volume, length and diameter of water mains, pressure range within the water system, locations of any pressure reducing valves or pressure booster stations, map or plat showing the proposed water system.
  - Anticipated average and maximum daily water use.
  - Anticipated number of industrial, commercial and residential water services.
  - Initial and projected customer population and service area.
  - Status of all department permits and approvals related to the construction of the water system.
  - Information for the identification, location and contact of the water system owner including the name, address and telephone number of the water system owner and the extent of the owner's responsibility for the water system.
  - Information for the identification, location and contact of the water system manager including the name, address and telephone number of the system manager.
  - Information for the identification, location, and contact of the water system operator including the name, address and telephone number of the water system's certified operator as defined in s. NR 114.03 (2), Wis. Adm. Code. If a certified operator has not been selected prior to submitting the capacity evaluation, a timetable for hiring an operator shall be included as part of the capacity evaluation in lieu of the information for the identification, location and contact of the water system operator. The water system may not be placed into operation until the department is provided with the information for the identification, location and contact of the water system operator.

- A plan identifying all sample locations for all monitoring required under ch. NR 809, Wis. Adm. Code and the US EPA Safe Drinking Water Act.
  - Description of the operational procedures required by chs. NR 809, 810 and 811, Wis. Adm. Code, and ch. PSC 185, Wis. Adm. Code, related to well head protection, well abandonment, cross connection control, operational reporting, meter testing, hydrant and valve exercising and operator certification.
  - Copy of the public service commission certificate authorizing construction and operation, and estimating rates, for municipal water systems regulated by the public service commission.
  - Statement from the water system owner on the financial capacity of the water system to meet the requirements of ch. NR 810, Wis. Adm. Code.
- 5) Apply to WDNR for Plan and Specification Approval under s. 281.41 Wis. Stats., and chs. NR 810 and 811, Wis. Adm. Code.
  - 6) Construct water distribution system pursuant to all relevant statutes and administrative rules and as approved by all necessary government agencies.

#### Routine Maintenance

Operate and maintain municipal water supply system using best practices and pursuant to s. NR 809, 810, and 811, Wis. Adm. Code as required for the protection of the public health safety and welfare.

- Establish and conduct all SDWA monitoring required for a municipal public drinking water system. Monitoring plan will be established based upon population served and municipal standards under ch. NR 809, Wis. Adm. Code. In general, the Village of Jackson will conduct required monitoring from the Village wells and extending to the Township metering pit. The Town of Jackson sanitary district is responsible for monitoring from the Town meter pit to the end of the Town distribution system. This will include monitoring from within the Town distribution system for bacteria, chlorine residual, lead and copper, and disinfection byproducts, as required by ch. NR 809, Wis. Adm. Code.
- Treatment for any water quality exceedances that develop at source water are generally the responsibility of the Village of Jackson Water Supply System. Treatment for exceedances that occur after the meter pit are generally the responsibility of the Town Sanitary District.
- Provide all customers with an annual Consumer Confidence Report. The consumer confidence report includes information regarding water quality, violations incurred during the year, and other basic information about the system. The report will include the results entry point from the Village of Jackson, and distribution system monitoring from the Town.

#### Sustaining the Public Water Supply for the Long-term

- 1) Provide training for staff in the operation and maintenance of the equipment (used for treatment including chemical additions) and maintain up-to-date manuals for the operation and maintenance of the equipment, as required by s. NR 810.25, Wis. Adm. Code.

- 2) Install water supply system security devices such as locks, fences, surveillance cameras, intrusion alarms, etc, as required by s NR 810.23, Wis. Adm. Code.
- 3) Develop an emergency operations plan to prepare for, respond to, mitigate and recover from all types of emergency situations, including terrorism, sabotage, natural disasters such as floods and tornadoes, loss of system-wide pressure, and overfeed of the chemical, as required by s. NR 810.23, Wis. Adm. Code.
- 4) Provide a current map of the water system which shows the size and location of all facilities and appurtenances, such as water mains, valves, hydrants, wells, pumping stations, treatment plants and water storage facilities. As required by s. NR 810.26, Wis. Adm. Code. Two current copies of this map shall be kept on file with the department (central and regional offices) at all times.
- 5) Develop and implement department approved Well Head Protection Plans, as required by s. NR 810.26, Wis. Adm. Code.
- 6) Develop emergency chlorination plans, with appropriate chlorination infrastructure and chlorine available to obtain 0.5 mg/l free chlorine throughout its distribution system within 4 hours, as required by s. NR 810.26, Wis. Adm. Code.
- 7) Develop and implement a long-term maintenance and repair funding and replacement schedule for all aspects of water supply and distribution system including pumps, mains, etc, as required by s. NR 810.26, Wis. Adm. Code.

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From: Public Service Commission of Wisconsin

To: Jackson Town board

## **New Water Utility Considerations**

April 24, 2013

### **Financial Responsibility and Management:**

When considering whether to approve a new utility, the PSC must consider whether the proposed public utility can handle all phases of operating a utility reliably, responsibly and professionally. Commission staff have concerns about the ongoing viability of the proposed Jackson system, due to its small size. In general, small utilities tend to present significant financial and operational challenges over the long term. Even if consultants are hired for most of the daily work, considerable management expertise is required on the part of the utility. All legal responsibility for utility operations falls on the municipality. Listed below are some of the responsibilities that a regulated public water utility (sanitary district) would have to conduct in a professional and timely manner:

- Establish and maintain financial accounting system in accordance with the Uniform System of Accounts.
- Ensure timely filing of accurate and complete annual financial reports.
- Ensure technical and managerial capability to deal with water utility service rules, including metering, billing, disconnection, and other consumer-related rules in PSC 185.
- Follow PSC procedures regarding establishing rates and charges, including timely filing of water rate cases.
- Additional information about creating a new utility can be found on the PSC website: <http://psc.wi.gov/utilityInfo/water/document/AFRwaterType2.pdf>

### **High Rates for Small Utilities:**

PSC is concerned about the ongoing financial viability of small systems. In general, utilities with a small residential customer base tend to have the highest operating costs per customers, and therefore, the highest water rates. Even without significant capital costs to build the utility because the facilities are contributed, the operation and maintenance (O&M) costs can exceed \$1,200 per year per customer. Over time, as facilities need to be replaced or as they are retired, the utility will need to finance capital improvements. Thus, rates will need to increase over time as capital expenditures are made. Listed below are some benchmark statistics from the PSC annual reports of small utilities regulated by the PSC.

O&M costs for utilities with less than 100 customers:  
Ranges from \$126 - \$1,251 per customer; average = \$476.

Quarterly service charge (minimum bill) for utilities with less than 100 customers:  
Ranges \$14 - \$300 per customer.